



Headquarters

U.S. Environmental Protection Agency

**PROGRESS REPORT ON  
ENVIRONMENTAL JUSTICE INTEGRATION**

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**THE OFFICE OF PREVENTION,**

**PESTICIDES, AND TOXIC SUBSTANCES**

**ENVIRONMENTAL JUSTICE PROGRESS REPORT**

**FY 2003**

## **The Office of Prevention, Pesticides, and Toxic Substances Environmental Justice Progress Report (2003)**

The Office of Prevention, Pesticides, and Toxic Substances (OPPTS) has a clear mission: to decrease the burden of environmental risk to all communities by promoting pollution prevention, safer chemicals, reduced chemical exposure risks, and the public's understanding of chemical risks. Under this mission, OPPTS is responsible for identifying, assessing, and reducing risks presented by thousands of chemicals on which our society and economy have come to depend. In managing risks, OPPTS directs its effort toward the greatest threats, including those found in populations and communities that may be disproportionately impacted by health or environmental threats. To this end, OPPTS is strongly committed to promoting and supporting environmental justice (EJ) principles, as this is the way we already do business.

In fiscal year (FY) 2003, OPPTS issued its first Environmental Justice Action Plan in response to the Agency's request for each program office to develop and implement strategies and activities to integrate EJ into existing programs. The completion of an EJ Action Plan allowed OPPTS to reflect upon the many EJ-related activities that take place everyday across the program offices and to assess goals and priorities for further promoting EJ principles. This Progress Report provides an assessment of OPPTS' performance on ensuring equal environmental protection for all. Building on the many years of EJ-related work, OPPTS made progress during FY 2003 toward protecting human health and the environment by using a mix of tools and approaches, and by working closely with its valued partners whose contributions were critical to many of the results achieved. OPPTS will continue to build upon these results until a robust EJ program is constructed and there is equitable distribution of environmental harms and risks.

### **PERFORMANCE RESULTS**

#### **OPPTS EJ Leadership and Coordination**

OPPTS consists of three major program areas: The Office of Pesticide Programs (OPP); The Office of Pollution Prevention and Toxics (OPPT); and The Office of Science Coordination and Policy (OSCP). In FY 2003, to ensure that the Office's approach to integrating EJ into its three program areas is consistent and coordinated, OPPTS formed the OPPTS EJ Team. The EJ team consists of a lead EJ coordinator, who oversees the flow of communication about EJ activities across OPPTS, and designated EJ coordinators and liaisons from each of the program offices. Supported by EJ network representatives from each Division, EJ coordinators and liaisons have been charged with the task of promoting integration of EJ into day-to-day activities by providing EJ guidance, advice, training, and support to managers and staff in their respective offices.

Also in FY 2003, OPPTS management affirmed its commitment to EJ by forming and participating on the Environmental Justice Coordinating Council (EJCC). The EJCC is led by the Deputy Assistant Administrator (DAA) and is comprised of Deputy Office Directors,

members of the EJ Team, and designated staff from across OPPTS. The EJCC was created to ensure that EJ is rooted into all of OPPTS' programs and policies and is charged with the responsibility of providing guidance and recommendations on how OPPTS can accomplish this goal.

In FY 2003, OPPTS also began the process of analyzing the depth of knowledge and training needs of the Office. This effort was assisted by a graduate intern that helped prepare an evaluation document, primarily supported and prepared by management participation. It is anticipated that the results of this assessment will help OPPTS plan a strategy of training that will ultimately enhance the level of staff knowledge and awareness surrounding issues of environmental justice. OPPTS' goal is to train at least 25% of its staff over the next two years.

### **Office of Pesticide Programs**

#### **1. Risk Reduction and Environmental/Public Health Protection**

*Review of Risk Assessment Processes* - OPP's work to promote EJ for the American public took many forms in FY 2003, including the review of its pesticide reregistration process for areas where EJ issues may be addressed. In OPP's Special Review and Reregistration Division (SRRD), the use patterns and routes of exposures of two chemicals (lindane and hexazinone) were examined to determine if there was the potential for any population sub-group to be disproportionately affected. Risk assessments were completed and exposure to population sub-groups was considered in the reregistration decision making process. Identified risks were addressed through risk management, which subsequently resulted in successful EJ mitigation. SRRD now has in place an EJ strategy for reviewing other reregistration chemicals, which includes meeting with stakeholders to address specific usage and exposure questions and addressing EJ questions during the reregistration peer review process. Plans are underway to incorporate EJ questions into the public participation process by asking the public for comments on groups or subpopulations that may be disproportionately impacted by the use of the specified pesticide.

OPP's Antimicrobial Division (AD) conducted a similar review of its risk assessment process in FY 2003. Several areas were identified where EJ considerations could be incorporated, including risk assessment considerations related to urban use of wood preservatives. AD will devise an EJ strategy for addressing the identified areas of concern in FY 04-05. The Registration Division (RD) is still in the process of reviewing its risk assessment processes.

Also in FY 2003, in an ongoing effort to improve risk assessment models to allow for better identification of risks in vulnerable and unique populations, OPP participated in an Internal Life Science Institute workshop on probabilistic worker exposure assessment. The purpose of the workgroup was to review existing studies used for probabilistic assessments, determine the strengths and weakness of each study, identify data gaps, and make recommendations for future studies. This was done to improve data contained in the Pesticide Handlers Exposure Database, a database used by the Health Effects Division (HED) to determine

worker exposure estimates. A final report from this workshop is due Fall 2004.

HED also participated in an EPA and Centers for Disease Control and Prevention workshop to explore ways to improve information about sources of exposures that may contribute to increased levels of pesticide metabolites in farmworker children. A review of existing literature on sources of pesticide exposure is currently being conducted. Research options for developing screening level assessments for potential exposure pathways will be developed, as resources permit.

*Assessment of pesticide exposure from dietary sources in targeted communities* - In FY 2003, OPP continued to provide disadvantaged communities or sub-populations the ability to ascertain risks in their environments. OPP worked with Region 1 and the New England Tribes (Passamaquoddy Indian Nation) to determine the potential health risks to native populations from consuming moose and deer livers that contain persistent, bioaccumulative and toxic pollutants. Approximately 80 samples of moose and deer livers were collected and are now being analyzed to determine the level of dioxins, furans and coplanar polychlorinated biphenyls (PCB). In 2001-2002, OPP provided similar support to residents of Mossville, Louisiana (Lake Calcasieu parish) where over 100 samples, which included air, drinking water, house and attic dust, fish, and other food items, were analyzed for toxic pollutants.

In FY 2003, OPP continued to play a consultative role in EPA Office of Water (OW)'s effort to identify chemicals that are toxic, persistent, and have the potential to bioaccumulate in fish. OPP provided to OW a list of pesticide compounds that have environmental fate characteristics that could potentially result in accumulation or biomagnification in fish or other wildlife tissues. OW considers this information when developing fish advisories.

*Review role of pesticides in environmental diseases* - OPP is still in the process of developing a strategic plan for evaluating the relationship between asthma and pesticides. OPP will conduct an assessment of public literature to determine the usefulness of pesticides and chemical mitigation on asthma causing agents affecting target communities, specifically inner city youths. OPP plans to develop a strategic plan and/or guidance that will assist in making risk management decisions regarding pesticide products that affect asthma causing pest. The goal is to improve OPP's ability to register and regulate pesticides that infer claims to aid in the control of asthma causing pests.

## 2. Outreach and Communication

*Assessment of Worker Protection Program* - Pesticide worker safety continues to be one of OPP's highest priorities. In FY 2003, as part of a commitment to improve its pesticide worker protection program, OPP completed a national assessment of the worker protection program to review the implementation and enforcement of the programs and ways to make these activities more effective. The assessment had three major components: 1) public workshops to discuss the worker protection program, identify the program's strengths and weaknesses, and foster an exchange of ideas for improving the implementation of the program; 2) the establishment of three workgroups to further examine key program issues; and 3) a worker protection

enforcement program element review (initiated by EPA's Office of Enforcement & Compliance Assurance and done in conjunction with OPP) to assess the combined effectiveness of the EPA and state compliance monitoring and enforcement efforts.

The National Assessment of the Worker Protection Program brought together a wide variety of program stakeholders who participated in assessment workshop meetings and workgroups. The workgroups focused on general training issues, a national pesticide safety train-the-trainer pilot, and a hazard communication pilot. For more information on the public workshops held in Texas, California, and Florida and to review the reports for the general training issues and train-the-trainer workgroup please consult <http://www.epa.gov/oppfead1/safety/workshops.htm>. Additionally, EPA headquarters, Regional and state pesticide lead agency staff conducted an enforcement program element review in every EPA region. The assessment process generated numerous recommendations for program improvement. The following program areas were identified as priorities for focus and further follow-up: pesticide incident monitoring and reporting, pesticide hazard communication and safety training, compliance monitoring and enforcement, complaints and retaliation, program guidance, and state oversight.

In response to the assessment, EPA implemented several changes to improve national consistency and program implementation in the short term. EPA has worked closely with its regulatory partners to develop better program guidance and to improve communications and reporting. Also, the Agency focused on providing additional training opportunities for state compliance monitoring and enforcement staff to improve national program consistency. Several other activities are underway and additional follow-up activities are planned. EPA plans to generate a report on the national assessment of the worker protection program, in which it will address the full range of stakeholder recommendations, as well as the findings from the enforcement program element review. The report will focus on the program issues identified during the assessment, the response to stakeholder recommendations, and the Agency activities completed, in progress, or planned to enhance and improve the national pesticide worker protection program.

*Train-the-Trainer Pilot Project-* The goal of this pilot was to develop a nationally adaptable train-the-trainer model that ensures consistency and quality in Worker Protection Standard (WPS) pesticide safety training. The objective was to design, implement, and evaluate a training model usable by all potential trainers that ensures the trainers obtain the basic training skills, tools, and knowledge they need to impart quality WPS training to workers. In FY 2003, three host states (Florida, New Jersey, and Washington) were selected to implement the pilot. This project, which is part of the National Assessment of the Worker Protection Program, was developed over an eighteen month period by a workgroup involving farmworker associations, training organizations, academia, county extension, grower groups, as well as other program stakeholders. The workgroup designed a curriculum for various trainer and worker training sessions, developed a training manual for the worker trainers, and collaborated with other organizations to develop the appropriate means of evaluating the project. This pilot project served to determine the feasibility of developing and implementing a national worker safety train the trainer certification program. The Train the Trainer Pilot Workgroup formally concluded its

business April, 2004. Because the instructor manual used during this pilot project received such positive reviews by participants, EPA is assembling an Instructor Handbook Development Committee to further enhance and refine the pesticide safety training manual. OPP plans to have the document available to the public in late FY2005.

*Agricultural Worker Training in Mexico* - To address the risks and needs of the agricultural labor flowing between the United States and Mexico, OPP collaborated with a consortium of interested parties from Mexico to develop a pesticide safety training program under the North American Free Trade Agreement. Those who work with or around pesticides have the highest risk of pesticide exposure. The United States and Mexico have coordinated their regulatory and education pesticide programs to benefit this population by developing a train-the-trainer program to provide safety information to agricultural workers.

In 2002, the Mexican Training Program (National Program Against the Risks of Pesticide Use) held pilots and training courses in the states of Sonora, Coahuila, Puebla, Nayarit, and Guanajuato. These training programs provide training to trainers, who then go out into the field and onto farms to provide training to agricultural workers. It is estimated that more than 2,000 workers have been trained under the program so far. The program utilizes EPA materials, such as "Pesticide Training for Agricultural Workers," and some of its own, including a "Guide on the Risks of Pesticide Use" pamphlet and a poster containing the government's regulations of security and hygiene of pesticide use.

Additionally, in 2003, the program was expanded to include training not only for agricultural workers, but also to the medical community. Utilizing the EPA-developed "Recognition and Management of Pesticide Poisoning", two training sessions were held and attended by primary health care providers, nurses, personnel from regional toxicology information centers and other health-related professionals.

*Pesticide safety training for farmworkers* - Since 1995, OPP has provided funding for several research and education programs designed to evaluate and convey pesticide safety information to farmworkers. In 2000, OPP formed a cooperative agreement with the Association of Farmworkers Opportunity Programs (AFOP) to train full-time educators to teach agricultural workers and their families how to reduce the risks from pesticide hazards. Through this program nearly 350,000 farmworkers, farmworker families, and community members have been trained about how to reduce risks from pesticide hazards. In FY 2003, over 50 educators were trained about pesticide safety, and education and outreach techniques. The pesticide educators reached out to approximately 20,000 farmworkers in FY 2003.

Additionally, in FY 2003, OPP formed a cooperative agreement with the Self-Reliance Foundation to produce at least 15 one-minute radio capsules in Spanish on pesticide safety issues. Some of the information to be conveyed to listeners includes symptoms of pesticide poisoning, keeping pesticides away from children, and the risks of spray drift. The pesticide messages should air in FY 2004.

*Public health and pesticides* - One of OPP's main goals is to protect public health by

minimizing potential health risks from pesticide exposure. In an ongoing effort to accomplish this goal, OPP collaborates with the National Institute for Occupational Safety and Health (NIOSH) of the Centers for Disease Control and Prevention (CDC) on collecting poisoning incidence data through the surveillance system SENSOR (Sentinel Events Notification Systems for Occupational Risks). SENSOR is a multi-state surveillance system that collects data on acute occupational pesticide-related illness and injury. Although funding was not available in FY 2003 for SENSOR, OPP still plans to work with NIOSH to improve incidence monitoring for pesticide overexposure.

Further, OPP collaborates with the Department of Labor (DOL) to obtain demographics, employment, and health characteristics of hired crop workers from DOL's National Agricultural Workers Survey (NAWS). NAWS is a national survey of farmworkers that collects extensive data from farmworkers concerning basic demographics, legal status, education, family size and household composition, wages and working conditions in farm jobs, and participation in the U.S. labor force. It is the only national information source on the demographics and working and living conditions of U.S. farmworkers. Over the past several years, OPP has provided funding to DOL to have health and pesticide-related questions included on the survey. In FY 2003, OPP obtained a full copy of the NAWS database. The database is currently being analyzed for EPA's use.

*Health Care Providers Initiative* - For the past five years, OPP has been working in partnership with the National Environmental Education and Training Foundation on a national initiative to improve the recognition, management, and prevention of pesticide-related health conditions by health care providers in the United States. As outlined in the Implementation Plan for the National Strategies for Health Care Providers: Pesticide Initiative, health care providers will be educated using a three-prong strategy that targets education settings, practice settings, and information resources and tools. The goal is to create significant change in the education and practice settings, so that students in health professions and primary care practitioners are prepared to recognize, effectively manage, and prevent health effects from pesticide poisonings and exposures.

In order to reach the goals of this innovative initiative, the National Pesticide Competency Guidelines for Medical and Nursing Education and the National Pesticide Practice Skills Guidelines for Medical and Nursing Practice were published in FY 2003. These guidelines will serve as tools for focusing schools and practicum programs on pesticide health education, will provide guidance directly to nurses and physicians to advance their skill in recognizing and managing pesticide-related illness, and will act as a models for faculty and administrators in integrating specific pesticide issues into education and training. Further, a National Forum showcasing the initiative and its implementation plan was held in FY 2003. More than 100 leaders in medicine, nursing, and environmental health attended the Forum and set a course of action to improve the recognition, management, and prevention of pesticide-related health conditions by health care providers. Using the Initiative's Implementation Plan for guidance, participants identified strategies and specific action items to expand the emerging nationwide network of health care providers committed to incorporating environmental health into primary care education and practice.

*Pesticide Information for the public* - In a cooperative effort with Oregon State University, OPP provides information to the public through the National Pesticide Information Center (NPIC). NPIC is a hotline that provides objective, science-based information on a variety of pesticide-related subjects, including pesticide products, recognition and management of pesticide poisonings, toxicology, and environmental chemistry. In FY 2003, NPIC answered 2,363 telephone calls about pesticides.

An important part of OPP's work is to develop outreach tools designed to educate the general population about pesticide safety. In FY 2003, OPP increased its focus on reaching out with safety messages to high-risk audiences in urban, low-income, and ethnically diverse communities. In an advertising campaign, OPP displayed pesticide safety messages on over 500 Washington, DC metro buses and 10 trains that service many of the minority communities. OPP also continues to provide information electronically to more than 300 groups registered with the People of Color Environmental Groups listserv. OPP regularly send pesticide-related public alerts, press announcements, actions, and decisions to the listserv.

Further, in FY 2003, OPP partnered with the Department of Agriculture (USDA) to provide pesticide safety information to food stamp suppliers, users, and others. OPP made a presentation at the National Organization for African American in Housing (NOAA) annual conference and displayed pesticide safety materials at an exhibit booth. Collaborative efforts are underway with OPPT's Lead Office to work with the Head Start Program.

In an effort to use the public education system to disseminate information on pesticide safety to children, OPP joined together with community leaders from New Mexico to develop read-to-use, age appropriate, teacher-friendly learning plans and classroom projects. The developed materials are now being promoted for use throughout the New Mexican community, including being featured on a television show produced by Eastern New Mexico University. OPP is still in the process of developing a plan to outreach to low-income minority communities through churches.

### 3. Pesticides in the Tribal Community

OPP works closely with tribal groups to obtain tribal perspectives on pesticide issues of significant concern. In FY 2003, OPP hosted two national meetings with the Tribal Pesticide Program Council (TPCC) to identify national and regional pesticide issues that are specific to Indian Country. OPP also facilitated cooperative activities between the state organization, the State FIFRA Issues Research and Evaluation Group (SFIREG), and TPCC to encourage the development of common solutions for mutual pesticide related concerns. OPP will continue to ensure that tribes are appropriately brought into stakeholder discussions and that information on EPA projects, programs, emerging issues and grant opportunities is disseminated.

In 2002, OPP initiated an effort to determine the feasibility and usefulness of modifying state-of-the-art "LifeLine" software (a tool OPP is already using in its pesticide exposure/risk assessment and tolerance setting processes) to enable it to capture unusual exposure pathways that may accompany the practice of tribal traditional ways of life. In FY 2003, OPP continued to

work very closely with a consortium of Native villages in Alaska, and with the Blackfeet Nation in Montana, to develop software modules that will accurately model their two unique living situations. Site visits were conducted and data were gathered for the new module. The module has been completed and OPP can now conduct a risk assessment based on the traditional lifestyle of the two modeled tribes. If the new software proves to be useful to the modeled tribal groups and to OPP, and if other tribes indicate an interest in forming a partnership to have similar models built, OPP will consider the feasibility of modeling additional tribal living scenarios in other biogeographical sections of the country.

To build tribal capacity to assess environmental threats from pesticides, OPP provides grants to tribes for targeted pesticide-related “field projects” such as surface to water quality management, endangered species protection, integrated pest management, and pesticide assessment, education, and outreach. For each of the past eight years, OPP’s competitive Tribal Pesticide and Water Quality Grant Program has provided approximately \$450,000 per year in direct funding to tribes. In addition to providing over \$300,000 to EPA regional offices to enable them to supplement tribal pesticide programs, OPP awarded 11 grants to support tribal development of increased and broadened in-house pesticide related expertise in FY 2003. Additionally, OPP conducted three water quality and pesticide management workshops for various tribal groups in FY 2003. Workshop participants included tribal experts and staff from local agricultural extension services and state and local environmental agencies. OPP sponsored separate workshops for tribal health care providers to receive training on the identification and treatment of pesticide exposure-related health conditions in the tribal community. Training was conducted in two areas of the country and was attended by more than 130 tribal health care providers from across the United States.

To improve the ability of tribes to define, design, implement and sustain well rounded pesticide management practices, OPP also worked with USDA to establish a model agreement with Navajo Nation for exemptions to FIFRA Section 18 to address pesticide emergencies.

### **Office of Pollution Prevention and Toxics**

OPPT’s Environmental Justice efforts are primarily focused on four major areas:

- 1) **Risk Reduction.** Reduction of existing risks is a critical component of OPPT’s environmental justice efforts, especially for national chemicals of concern such as lead (Pb), asbestos, PCBs and mercury. OPPT continues a major effort to address childhood lead poisoning by gearing much of its effort toward reaching poor, people-of-color children living in inner city areas. OPPT has achieved many accomplishments in this area and continues to address this critical concern. These national chemicals of concern also have a great impact on communities with a subsistence culture, especially the Tribes.
- 2) **Tools for Identifying, Assessing, Reducing and Preventing Risk.** Risk identification and the prevention/reduction of risks are key to addressing or eliminating current and future environmental justice concerns. OPPT continues to develop tools to assist EPA, communities, governments and others to target areas of concern due to manufacture or use

of industrial chemicals. Many of our programs are designed to assure that adequate information is available to EPA and/or to the public to assess risks from exposure to chemicals in local environments. OPPT's efforts to help reduce environmental risks in disadvantaged and people-of-color communities go beyond reducing and managing risks to preventing pollution and waste at the source. OPPT promotes partnerships, collaboration, and a proactive approach to minimizing and eliminating risks from chemicals.

- 3) Action for Tribal Communities. OPPT is committed to working in partnership with tribal governments to safeguard and protect the environment from toxic hazards and to promote pollution prevention in Indian country.
- 4) Communication and Organizational Culture. Over the past year, OPPT has been actively involved in addressing environmental justice issues and has, as a result, incorporated elements of environmental justice in many of its current programs and activities. This is supported by the management commitment to ensure the goal of environmental justice is achieved by incorporating into the culture and performance of all employees and through the office's risk continuum approach of risk identification, reduction/prevention and management. OPPT has established communication strategies that engage community support and outreach as a major cornerstone of the program.

#### **A. Risk Reduction**

##### Lead

Lead poisoning is most prevalent in poorly-maintained older housing, and the population most at risk is poor, people-of-color children living in inner city and rural areas. Much of EPA's effort to combat lead poisoning is geared towards reaching this population most at risk, and the entire program reflects the Agency's ongoing commitment to environmental justice.

In 2003, OPPT worked collaboratively with the Head Start Bureau (part of HHS) and the National Head Start Association (NHSA, a trade group). NHSA has over 9,000 members across the country. OPPT has worked with the NHSA on design and development of lead awareness materials as well as conducting a small informal focus group to test the effectiveness of the draft documents on Head Start teachers and parents.

The Head Start campaign documents were premiered recently at the NHSA's national training conference in Anaheim, CA. The documents consist of a parent brochure, a fact sheets which provides general lead information, a fact sheet for the Head Start Health Specialist on health information on lead, and 3 teacher curriculum fact sheets. This material will initially be sent to Head Start Centers in 5 selected cities which have a great number of Head Start facilities as well as a large number of homes with lead paint.

#### **B. Tools for Identifying, Assessing, Reducing and Preventing Risk**

Identification of hazards and risks is critical to environmental justice communities. Only

once the risks are known can the problems be prioritized and addressed most effectively. OPPT has developed a number of programs and tools to assist the Agency and others in this identification process. Outreach to the general public and specific populations with these tools and information on chemicals of concern is a key ingredient in our efforts to assist environmental justice communities.

### Pollution Prevention

In collaboration with other EPA offices, OPPT provided economic and technical support to the National Environmental Justice Advisory Council P2 workgroup. The report entitled, “*Advancing Environmental Justice Through Pollution Prevention*”, was completed in June 2003. Specifically, the report included recommendations to the Agency on the following areas: develop and promote implementation of a multi-stakeholder collaborative model, identify and implement opportunities to advance EJ through P2 in federal environmental statutes, promote product substitution and process substitution in areas which impact low-income, people-of-color and tribal communities.

### New and Existing Chemicals

OPPT oversees two critical activities designed to provide the Agency and the public with more information on the hazards of a large number of industrial chemicals: the High Production Volume (HPV) Program and the Voluntary Children's Chemical Evaluation Program (VCCEP). These programs are designed to assure that adequate information is available to the public to assess risks from exposure to chemicals in local environments. The programs have two components: information collection (including data development) and public dissemination. Specifically, the HPV program will generate basic toxicity data on most of approximately 2,800 high production volume chemicals (those chemicals manufactured or imported in amounts equal to or greater than one million pounds per year), and VCCEP will assess the risks to children from 20 chemicals to which children are disproportionately exposed. In 2004, the HPV Program will make 1,200 HPV data available. EPA received 4 chemicals (vinylidene chloride, pentabromodiphenyl ether, decarbromodiphenyl ether, and octabromodiphenylether) and data needs that underwent PEER Consultation in FY03 related to VCCEP (i.e., hazard, exposure, and risk assessments).

### **C. Action for Tribal Communities**

Under a general heading of “Greening Indian Country,” this program enhanced the awareness and use of pollution prevention and more environmentally friendly approaches in Indian Country. Specific elements included:

- Development of a 4-page brochure to describe the Mohegan Sun as a Pollution Prevention success story. The Mohegan Sun is a success story of how to incorporate pollution prevention technology in buildings. The Mohegan Sun is a world class casino resort that integrated many “state of the art” pollution prevention technologies into the facilities such as fuel cells, use of hybrid vehicles, use of bamboo hardwood floors and the like.

- Began the design for a Tribal Portal into the Pollution Prevention Exchange Internet Information Network to establish a Tribal Sector Hub to provide P2 information access to Indian Country.
- Initiated a Strategy with the national Partnership for Environmental Technology Education (PETE) to develop “Visionary Planning for the Seventh Generation” to plan activities such as pamphlets on Tribal P2 success stories, brochures on “What can be done now!,” and to encourage participation in conferences (i.e., National Tribal Environmental Council’s and workshops).
- EPA’s Pollution Prevention Division established through the National Pollution Prevention Roundtable (NPPR) a two-year effort to expand Tribal involvement in the Roundtable. This effort will focus on activities such as mentoring discussion groups, a Tribal working group to advise the NPPR, and increased Tribal participation at P2 conferences.
- Continued work on Tribal participation in the Hospitals for a Healthy Environment and related programs. Continued to build on Region 5 and Region 9 work on reducing mercury at Tribal (Indian Health Service) health clinics.

In 2003, OPPT’s Forum on State and Tribal Toxics Action (FOSTTA) Tribal Affairs Project continued as a mechanism for tribes to provide EPA with valuable program expertise from the tribal perspective. In 2003, three meetings of the Tribal Affairs Project were held, which resulted in identification of areas for tribal involvement and inclusion in both pollution prevention and risk assessment. Also, the meetings served as a forum to discuss the options of developing risk assessment models incorporating information regarding chemical releases on tribal lands that fall within the Toxic Release Inventory (TRI). OPPT appointed a representative during 2003 to serve on the NPPTAC committee to ensure that tribal issues and concerns were incorporated into the decision process.

The OPPTS Tribal Newsletter continued to offer in 2003 a variety of information on topics regarding OPPTS environmental programs, and includes a variety of news articles and information from the Tribes and Tribal organizations themselves. This publication has grown in readership and recognition from our Tribal partners and continues to enjoy a wide distribution in Indian Country and at EPA. This newsletter also has featured many stories and articles from the environmental justice communities and from EPA’s Office of Environmental Justice. OPPT is coordinating with the other Program Offices within the Agency, including OEJ, to develop an Agency-wide Tribal Newsletter pilot edition to be published in early FY04."

#### **D. Communication and Organizational Culture**

In 2003, OPPTS convened the Environmental Justice Coordinating Council (EJCC). In support of EJCC efforts, OPPT began to analyze EJ-related knowledge and training needs of the office. It is anticipated that the results of this assessment will help OPPT to develop and implement a strategy of training that will enhance the level of staff knowledge and awareness

surrounding issues of environmental justice.

#### **E. Obstacles**

OPPT experienced a decline in resources that required the office to realign funds and projects. This realignment of funds caused a few lead-related activities to be withdrawn from the 2003 EJ Action Plan. The following activities were inactive:

- The performance of technical studies to identify ways to assess and reduce lead risks at a lower cost;
- Provide appropriate free courses in high-risk “hot spots”; and
- Evaluate children’s blood lead level in Indian country and develop programs through grants, where appropriate.

#### **Appendix A: OPPTS FY 2003 Environmental Justice Performance Measures**

Outlined in Appendix A are OPPTS EJ Performance Measures for FY 2003. The status of each project is listed, along with a description of the strategies, activities, performance measures, and required resources for implementation.

## Appendix A OPP ENVIRONMENTAL JUSTICE STRATEGIES AND ACTIVITIES MATRIX

### Risk Assessment Component

**GOAL #1:** Assess level of exposure to pesticides from aquatic dietary sources for targeted communities

Strategies	Activities	Duration/ Due Date	Perf Measures	Resources (FTE/\$)	Status
1. Collaborate with Office of Water on Fish Advisories for Pesticides	1a. Identify chemicals that are toxic, persistent, and have the potential to bioaccumulate in fish. 1b. Work with Office of Water to determine process for providing fish bioaccumulation information on these chemicals 1c. OW will consider this information when developing their fish advisories.	1a. On-going	List of chemicals and identify process	0.01 FTE	Ongoing - provide consultation to OW as needed.

**GOAL #2:** Provide disadvantaged communities or sub-populations the ability to ascertain risks in their environment

Strategies	Activities	Duration/ Due Date	Perf Measures	Resources (FTE/\$)	Status
Provide analytic support to disadvantaged communities	Analyze samples for contaminants that may expose disadvantaged communities to risks, as resources permit	FY 2003	Analytic Results	0.2 FTE	In progress - samples from tribal dietary sources are currently being analyzed.

**GOAL #3: Improve Environmental Justice Risk Assessment Capabilities** - Improve risk assessment models to potentially allow OPP to better identify risks of concern for vulnerable unique populations (i.e., Native Americans, Hispanics, etc.).

Strategies	Activities	Duration/ Due Date	Perf Meas.	Resources (FTE/\$)	Status
Improve Pesticide Handlers Exposure Database	Refine and assess the data base to determine data needed for improvement	FY 2003	list of data elements needed	0.05 FTE	Goals met - final report due fall 2004.

**GOAL #4: Improve Environmental Justice Risk Assessment Capabilities** - Consider options for improving risk assessments for communities near agricultural sites.

Strategies	Activities	Duration/ Due Date	Perf Meas	Resources (FTE/\$)	Status
Seek ways to improve information about sources of exposures for use in risk assessment; potential for modeling	As resources permit, develop options and plans for research in cooperation with ORD to determine sources of exposures that may contribute to increased levels of pesticide metabolites in farm worker children	FY 2005	list of options	0.4 FTE	In progress - review of published literature on sources of pesticide exposure is currently in progress.

### Risk Management Component

**GOAL #1:** To ensure that sub-populations do not bear a disproportionate share of exposure or potential risk associated with pesticide use

Strategies	Activities	Duration/ Due Date	Perf Measures	Resources (FTE/\$)	Status
<p>1. Assess process for applying EJ principles to reregistration/re-assessment of older pesticides</p>	<p>1a. Identify three chemicals with potential for increased exposure to sub-populations to use as pilot</p> <p>1b. Conduct risk assessments for the sub-populations.</p> <p>1c. Address identified risks through risk management</p> <p>1d. Develop EJ strategy for reregistration of existing chemicals based on pilot, if applicable.</p>	<p>FY 2003-2004</p>	<p>1a. list of chemicals with potential for these risks</p> <p>1b. Risk assessment with available data for unique/sub-population exposure</p> <p>1c. Signed RED with EJ mitigation and possible label improvements</p> <p>1d. Could lead to an EJ strategy that addresses groundwater, farm workers, and urban populations.</p>	<p>1a. 0.05 FTE</p> <p>1b. OPP Science Div.</p> <p>1c. 0.15 FTE</p> <p>1d. 0.05 FTE</p>	<p>In progress - two chemicals groups have been identified to serve as pilots for reviewing the risk assessment process.</p> <p>EJ risk management decisions were recently made for lindane and hexazinone.</p>

Strategies	Activities	Duration/ Due Date	Perf Measures	Resources (FTE/\$)	Status
2. Implement EJ strategy for reregistration	<p>2a. Develop EJ questions to be included in existing reregistration checklist.</p> <p>2b. Review and approve the EJ section of the checklist.</p>	<p>2a. FY 2003</p> <p>2b. FY 2003</p>	2 Checklist Implemented with an EJ component.	<p>2a. 0.05 FTE</p> <p>2b. 0.02 FTE</p>	<p>Goal met - questions were developed and have been incorporated in the SMART meeting question list that goes to the registrant. Same questions will be incorporated in the NoHRM question list.</p> <p>A section for EJ will not be included on the reregistration checklist, however, EJ questions will be included in all review processes (SMART, NoHRM, Peer Review).</p>

Strategies	Activities	Duration/ Due Date	Perf Measures	Resources (FTE/\$)	Status
3. EJ Training.in SRRD	3a.EJ Training to be added to existing reregistration training modules.  3b.Define EJ for reregistration of existing chemicals  3c.EJ Checklist	FY 2003	3. SRRD Training Module with EJ Included.	3a. 0.05 FTE	In progress - a draft EJ guidance paper for SRRD has been developed.

**GOAL #2:** Improve management of the risks of existing pesticides in relation to exposed sub-populations

Strategies	Activities	Duration/ Due Date	Perf Measures	Resources (FTE/\$)	Status
1. Continue to collaborate with stakeholders, Regions, unique population groups, etc.	1a. Identify stakeholder representatives for various groups. 1b. Conference calls with groups to obtain and pass on information.	1a. 1 month after initial pesticide team meeting. 1b. Ongoing	1a. Meetings/ conf. calls 1b. Meetings/ conf. calls	1. 0.05 FTE	Ongoing
2. Ask for comments on unique/sub populations affected by decision	2. Incorporate EJ questions/language into the Notice of Availability Template	FY 2003	2. Published FR Notice with EJ questions	2. 0.05 FTE	In progress - working on incorporating the following statement "please provide comments on any groups or sub-populations that may be impacted by the use of "X" pesticide" included in the FR Notice of Availability, and in the public participation process.
3. Incorporate EJ into the reregistration Peer Review Process	3. Provide EJ questions to Peer Review Workgroups	FY 2003	3. Peer Review Recommendations	3. 0.05 FTE	Goals met - EJ questions have been added to the peer review process.

**GOAL #3:** Improve the integration of EJ principles into the antimicrobial regulatory process to ensure the protection of sub-populations.

<b>Strategies</b>	<b>Activities</b>	<b>Duration/ Due Date</b>	<b>Perf Measures</b>	<b>Resources (FTE/\$)</b>	<b>Status</b>
Evaluate opportunities to incorporate environmental justice considerations in Antimicrobial pesticide programs	Review programs such as ecological assessments for antifoulant leakage and fish contamination in sub-populations, urban hospital disinfectants use and correlations to compromised immune systems and antimicrobial resistance issues; and CCA wood preservatives treatment facilities location, disposal, incineration, and public information exchange.	FY 2003	Identification of areas for attention to EJ issues	0.05 FTE	Goal met - areas for EJ incorporation were identified.

**GOAL #4:** To ensure that sub-populations do not bear disproportionate exposure or potential risk from conventional pesticide registration programs

<b>Strategies</b>	<b>Activities</b>	<b>Duration/ Due Date</b>	<b>Performance Measures</b>	<b>Resources (FTE/\$)</b>	<b>Status</b>
Assess process for applying EJ principles to conventional pesticide registration programs	Review programs and processes to identify potential areas to implement EJ considerations	FY 2003-2004	Identification of areas for attention to EJ issues	0.05 FTE	In progress

## Field Component

**GOAL #1:** Better protect farm workers and their families from pesticide exposures through improved regulation and training

Strategies	Activities	Duration/ Due Date	Perf Measures	Resources (FTE/\$)	Status
1. Assessment of existing worker protection program	1a. Evaluation of input from stake-holder workshops 1b. Hazard communications pilot development 1c. Pilot Train the Trainer Project focusing on improving pesticide safety training for those who train farmworkers	FY 2003	1a. Pilot assessments 1b. Regulatory change recommended 1c. Implement Pilot Trainer Training Project in Florida, New Jersey, and Washington State	1. 0.2 FTE/ \$100,000 1b. 0.1 FTE \$50,000 1c. 0.1 FTE \$50,000	Goals met - a report on the assessment of the worker protection program was published. Train-the-Trainer pilots were conducted in three states. The hazard communication pilot is still in development.
2. Improve availability of information for farm workers and their families	2a. Hispanic Radio Network spots with pesticide safety information 2b. Improve safety training for farm worker families through grants	2. Ongoing, as funding allows	2a. HRN call-backs and survey 2b. Pre- and post-tests	2a. 0.1 FTE \$25,000 2b. 0.05 FTE \$100,000	In progress - radio spots are still being developed and farmworkers are still being trained.

Strategies	Activities	Duration/ Due Date	Perf Measures	Resources (FTE/\$)	Status
3. Share protection programs with other governments	3. Bilateral project with Mexico on worker protection: pilot programs	3.Ongoing monitoring and guidance	3. Monitoring tools for results	3. 0.1 FTE \$15,000	Goals met - Mexico implemented a pilot worker safety training program. OPP continues to provide consultation.

**GOAL #2: Improve Public Health relative to pesticide exposure and risk**

Strategies	Activities	Duration/ Due Date	Performance Measures	Resources (FTE/\$)	Status
1. Monitor public health relative to pesticide exposures	<p>1a. Collect sentinel poisoning incident data through IAG (SENSOR), as resources permit</p> <p>1b. Multi-agency epidemiology study of long-term effects on certified applicators and families</p>	<p>1a. Ongoing</p> <p>1b. FY 2003</p>	<p>1a,b. Data bases for risk assessment use</p> <p>1b. report on findings</p>	<p>1a. 0.1 FTE</p> <p>1b. 0.1 FTE</p>	<p>Funding was not available during FY03 for SENSOR.</p>
2. Address issues of exposures to farm workers and their families	<p>Assessment of information from National Agricultural Workers Survey (NAWS)</p>	<p>FY 2003</p>	<p>Reports and data bases for program use</p>	<p>0.1 FTE</p>	<p>In progress- full NAWS database was obtained from DOL and currently being analyzed for OPP use</p>
3. Improve recognition, management, and prevention of pesticide-related health conditions	<p>Provide health care professionals training and education on pesticide health issues.</p>	<p>FY 2003</p>	<p>National Forum</p>	<p>0.1 FTE</p>	<p>Goal met - over 100 health professionals attended the National Forum</p>

**GOAL #3:** Strengthen pesticide program development, support, and implementation in Indian country.

Strategies	Activities	Duration/ Due Date	Performance Measures	Resources (FTE/\$)	Status
1. Improve the ability of tribes to define, design, implement and sustain well rounded pesticide management practices suited to the needs of Indian country.	<p>1a. As funding allows, provide ongoing support for tribal pesticide circuit rider programs.</p> <p>1b. Work with USDA/APHIS to develop and refine a mechanism whereby exemptions to FIFRA Section 18 may be made available to address pesticide emergencies in Indian country.</p>	<p>1a. FY 2003</p> <p>1b. FY 2003</p>	<p>1a. Active circuit rider program in Region 10 is being funded with OECA STAG monies</p> <p>1b. Mechanism for exemptions to FIFRA Section 18 in place</p>	<p>1a. N/A</p> <p>1b.0.1 FTE</p>	<p>Program now supported by OECA.</p> <p>1b. Goal met - model agreement with Navajo Nation/APHIS /EPA now in place.</p>

**GOAL #4:** Enhance and modify risk management to meet tribal cultural concerns.

Strategies	Activities	Duration/ Due Date	Perf. Measures	Resources (FTE/\$)	Status
<p>1. Improve the ability of both EPA and tribes to evaluate the scope and magnitude of human pesticide exposure risks in Indian country.</p>	<p>1a. Develop software modules that will model pesticide and chemical risk exposures for practitioners of traditional cultural ways of life in two biogeographical areas of the country.</p> <p>Evaluate the benefits of extending the effort to tribes in other parts of the country. Depending on outcome and resources, fund and expand project.</p>	<p>1a. FY 2003-2004</p>	<p>1a. Complete modules</p> <p>Complete evaluation and continue project if appropriate</p>	<p>1a.0.20 FTE through FY 03 and \$276,000 in FY02 and FY03 money</p>	<p>Goal met - module developed for tribal risk assessment.</p> <p>Training was provided to over 130 tribal health care providers.</p>
	<p>1b. Provide funding support to bring a team of medical doctors, epidemiologists, and other pesticide experts into Indian country to provide training in the elimination, identification and treatment of pesticide exposure related illnesses among community members, farm workers, and others.</p>	<p>1b. FY 2003</p>	<p>1b. Complete training for tribes in two areas of the country</p>	<p>0.05- 0.25 FTE</p> <p>1b. 0.1 FTE/ \$100,000</p>	

**GOAL #5: Build Tribal Capacity**

Strategies	Activities	Duration/Due Date	Perf Measures	Resources (FTE/\$)	Status
<p>1. Support tribal development of increased and broadened in-house, pesticide related expertise.</p>	<p>1a. Provide competed tribal grants for targeted, pesticide related “field projects” such as water quality management and endangered species protection.</p>	<p>1a.Ongoing</p>	<p>1a. Award grants and follow up on success rates</p>	<p>1a. 0.15 FTE \$245,500</p>	<p>Goal met - eleven grants were awarded. Water quality and pesticide management workshops were conducted and financial support was given to Regions to supplement pesticide programs.</p>
	<p>1b. Provide tailored water quality/pesticide management workshops in Indian country for tribal environmental managers, along with follow up information by way of written pesticide news update mailings.</p>	<p>1b.Ongoing</p>	<p>1b. Host three workshops per year, including one advanced workshop and begin written outreach publication.</p>	<p>1b. 0.05 FTE/ \$185,000</p>	
	<p>1c. As funding allows, provide resources to EPA regional offices to enable them to supplement other pesticide program funding to tribes.</p>	<p>1c.Ongoing</p>	<p>1c. Determine and fund regional distribution</p>	<p>1c. 0.05 FTE</p>	

**Goal #6: Improve consultation, communication, and outreach with Tribes**

Strategies	Activities	Duration/Due Date	Perf Measures	Resources (FTE/\$)	Status
<p>1. Work closely with tribes to identify national pesticide issues that are of significant concern to tribal populations. Ensure that tribes are appropriately brought into stakeholder discussions of such issues, and that tribal concerns are considered during OPP's decision making processes.</p>	<p>1a. Continue to work in close partnership with Tribal Pesticide Program Council (TPPC) members to clearly identify the pesticide related concerns of Indian country.</p>	<p>1a.Ongoing</p>	<p>1a. Two national meetings/year; monthly conference calls; Regular contact with TPPC facilitator</p>	<p>1a. 0.35 FTE/ \$180,000</p>	<p>Goal met - OPP continues to provide consultation, communication, and outreach to the tribal community</p>
	<p>1b. Ensure that appropriate EPA decision makers are aware of Indian country's pesticide related concerns, and take those concerns into consideration when making regulatory decisions.</p>	<p>1b.Ongoing</p>	<p>1b. Regularly scheduled in-house information sharing meetings at all levels.</p>	<p>1b. 0.3 FTE</p>	
	<p>1c. Disseminate information on EPA projects, programs, emerging issues and grant opportunities that may affect and/or be of interest to pesticide program managers in Indian country.</p>	<p>1c.Ongoing</p>	<p>1c. OPPTS Tribal Newsletter. E-mail to tribes through Native Ecology Initiative grantee. Telephone calls to tribal environmental managers, tribal governmental leaders, tribal consortia and others as needed.</p>	<p>1c. 0.1 FTE/ \$12,000</p>	

**GOAL #7:**To communicate pesticide safety information to high-risk audiences in urban, low-income, and ethnically diverse communities across the nation.

Strategies	Activities	Duration/ Due Date	Perf Measures	Resourc es (FTE/\$)	Status
1. To communicate pesticide safety information in an easily accessible manner	Washington, DC Metro Advertising Campaign - pesticide safety ads (English/Spanish) currently running on 550 buses and 10 subway stations in many urban, low-income minority communities.	Aug 1-Sept 1	Metro will provide count of number of passengers	0.1 FTE/ \$12,000	Goal met
2. To use the public education system to disseminate information on pesticide safety to children.	New Mexico Family, Career, community Leaders - Through an OPP grant, New Mexican community leaders would use the Agency's Read the Label First! materials to develop ready-to-use, age appropriate, teacher-friendly learning plans and suggested classroom projects. The grantee will also promote the use of these materials in Family and Consumer Life Science classes (secondary school level) nationwide.	FY 2003	Grantee will develop teacher and student evaluation instruments that solicit feedback regarding the effectiveness of the materials, how they were utilized, and how well they were received.	0.1 FTE/ \$24,456	Goal met - learning plans and suggested classroom projects have been developed. Outreach to promote the materials continues to be conducted.

Strategies	Activities	Duration/ Due Date	Perf Measures	Resource es (FTE/\$)	Status
3. To provide information electronically to ethnically diverse communities.	Distributing Pesticide Information to the People of Color Directory - OPP has included more than 300 groups from the People of Color Environmental Groups Directory to our LISTSERV. OPP regularly sends pesticide-related public alerts, press announcements, actions, and decisions to the LISTSERV.	Regularly/ As determined	OPP is currently developing a measuring tool to receive feedback from the LISTSERV.	0.1 FTE	Ongoing

Strategies	Activities	Duration/ Due Date	Perf Measures	Resourc es (FTE/\$)	Status
4. To communicate pesticide safety information in an easily accessible manner	Church and School Outreach Campaign - distribute pesticide safety brochures (English/Spanish) to churches and schools in many urban, low-income minority communities across the Nation.	Indefinite	Eval. of success can be measured by requests for additional copies of brochures, consumer phone calls to NPIC, and EPA-sponsored surveys or focus groups.	0.2 FTE/ \$15K.	In progress - method of initial contact with churches is being reevaluated

Strategies	Activities	Duration/ Due Date	Perf Measures	Resource es (FTE/\$)	Status
<p>5. To provide information on pesticide safety to disadvantaged people using government services.</p>	<p>5a. Partner with USDA's Woman, Infants and Children Program (WIC) to provide pesticide safety information to food stamp suppliers, users, and others.</p> <p>5b. Partner with DHHS Head Start Program to provide pesticide safety information to Head Start Center Directors, staff and parents.</p> <p>5c. Partner with Low-Income/Public Housing Groups to provide outreach materials to residents. Possible partners include National Low Income Housing Coalition, Council of Large Public Housing Authorities, and the National Association of Housing and Redevelopment Officials.</p> <p>5d. Partner with the American Association of Poison Control Centers to provide centers with pesticide safety information to distribute to callers</p>	<p>1 year pilot</p>	<p>Performance measures would be based on the number of publications distributed.</p>	<p>0.1 FTE</p>	<p>In progress - a single packet of materials has been sent WIC centers for them to order materials.</p> <p>OPP is collaborating with the Lead Office to conduct a joint project with Head Start.</p> <p>OPP is working with NOAA to provide Community Action Kits to their public housing resident leaders.</p> <p>OPP partnered with Poison Centers to conduct the "Lock It Up" campaign.</p>

**GOAL #8:** To assist the public with concerns about pesticide exposures

Strategies	Activities	Duration/ Due Date	Perf Measures	Resources (FTE/\$)	Status
<p>1. Assist individuals who may have been exposed to a pesticide, or suffered a toxic or adverse effect or may suffer a delayed or chronic adverse effect in the future. Also, provide easy access to information regarding pesticides and pesticide-related issues. Overall, to reduce pesticide risk to all individuals/populations.</p>	<p>1a. The Pesticide Incident Response Officer (PIRO) will respond to pesticide incidents.</p> <p>1b. Continue the National Pesticide Medical Monitoring Program (NPMMP) cooperative agreement.</p> <p>1c. Continue the National Pesticide Information Center (NPIC) cooperative agreement.</p>	<p>1a. Ongoing</p> <p>1b. 12/31/03</p> <p>1c. 03/31/05</p>	<p>1a. Number of calls</p> <p>1b. Number of cases investigated</p> <p>1c. Number of calls</p>	<p>1a. 0.10-0.20 FTE</p> <p>1b. 0.02 FTE/\$4600</p> <p>1c.0.05 FTE/\$132,750</p>	<p>Ongoing - NPIC answered over 2,300 calls. The PIRO responded to six pesticide incident calls.</p>

**GOAL #9:** To increase understanding and awareness of Environmental Justice by EPA staff.

Strategies	Activities	Duration/ Due Date	Perf Measures	Resource s (FTE/\$)	Lead Contact
1. Train OPP EJ trainers to provide adequate EJ training throughout OPP.	1. Work with OEJ to provide training sessions to train OPP EJ trainers.	1. FY2003	1. Adequate # of OPP EJ trainers	0.3 FTEs	In progress - an EJ training strategy was develop for OPPTS. The training will be a coordinated effort across OPPTS.
2. Provide EJ training to OPP	2a. Form an EJ Trainers Workgroup to design a 1-day EJ Workshop for OPP.  2b. As funding is available, develop materials for EJ Workshop.  2c. Schedule EJ Workshops for OPP.	2a. FY2003  2b. FY2003  2c. FY2003- 2004	Incorporating EJ into OPP work.	0.5 FTEs	In progress - an EJ training strategy was develop for OPPTS. The training will be a coordinated effort across OPPTS.

## Benefits Component

**GOAL#1:** To investigate and determine if the potential use of a pesticide has a role in the reduction or stimulation of environmental disease such as asthma in urban areas.

Strategies	Activities	Duration/ Due Date	Performance Measures	Resources (FTE/\$)	Status
<p>1. Develop a strategic plan for OPP to follow in evaluating the relationship between asthma and pesticides.</p>	<p>1. Search public literature, compile and analyze information, and assess issues related to pesticides, pest control, and asthma, and develop options to address them.</p> <p>1d. Draft guidance for labeling pesticides to carry asthma claims</p> <p>1e. Finalize guidance</p> <p>1f. Develop outreach methods to educate the public about controls including the use of pesticides</p>	<p>1a,b,c. Completed in FY2002</p> <p>1d. FY2003</p> <p>1e. FY2004</p> <p>1f. FY2004</p>	<p>1a,b,c. Completed</p> <p>1d,e. <b>Interim Measure of success:</b> Development of OPP policy document, i.e., PR Notice for pesticide use for control of asthma- causing pests.</p> <p><b>Primary Measure:</b> Register asthma-safe pesticide products that are efficacious against asthma causing agents</p>	<p>1.0 FTE</p>	<p>A draft Strategic Plan was written based on the literature. However, RD believes that there needs to be a refocus on the information gathered targeting inner city youths and their issues with asthma and asthma causing agents. This approach will provide more information for a developed Strategic Plan and possible policy documents.</p>

## OPPT ENVIRONMENTAL JUSTICE STRATEGIES AND ACTIVITIES

### Risk Management Component

#### Goal #1: Advance EJ issues within the Agency's national chemicals program

Strategies A. General	Activities	Duration/ Due Date	Perf Measures	Resources (FTE/\$)	Lead Contact	Status
1. Plans for informing staff of strategies, approaches, and their EJ responsibilities	1a. Adapt National EJ Training Collaborative plan in (2) below	06/03	Complete final plan	0.15	Designated Staff (DS) DS DS	OPPTS has convened an Environmental Justice Coordinating Council (EJCC) to review and advise all programmatic divisions on how to further integrate EJ. To that end, the EJCC has and will continue to consider all of these activities outlined under Goal #1 and ensure that, where appropriate, they have been considered in the office's strategic planning and overall mission. At this time, the EJCC has effectively articulated the priority of EJ within OPPTS and will, according to the activities outlined in the 2004-2005 EJ Action Plan, ensure appropriate integration is achieved.
	1b. Update draft plan	08/03		0.1		
	2c. Implement final plan	01/04		0.1		
2. Develop Grants and Contracts Guidance	2a. Participate in OPPT workgroup	Ongoing	Complete final guidance Complete training	0.05	DS DS DS DS DS	
	2b. Develop interim guidelines	08/03		0.1		
	2c. Review and comment of interim guidelines by EJ Council	12/03		0.1		
	2d. Develop final guidance	01/04		0.1		
	2e. Conduct staff training.	06/04		0.2		
3. Develop Permitting Guidance	Develop permitting guidance in tandem with item strategy 2 above	06/04	Complete permitting guidance	0.1	DS	
4. Develop Public Participation Guidance	4a. Work with the Headquarters' Public Relation Liaison to ensure collaborative efforts in integrating Public involvement and EJ policies into NPCD programs	Ongoing	Continue ongoing work with HQ Public Relation Liaison	0.05	Outreach Team	
	4b. Solicit stakeholders feedback on public involvement with under represented groups as part of the stakeholders input meetings	Ongoing	Continue working with stakeholders	0.05	Outreach Team	

Strategies A. General	Activities	Duration/ Due Date	Perf Measures	Resources (FTE/\$)	Lead Contact	Status
5. Incorporate EJ into program, policy, and outreach activities	5a. Develop plan to implement, incorporate EJ into program, policy, and outreach activities 5. Review/approval of draft plan 5c. Implementation of final plan	06/03  12/03 06/04	Incorporate EJ into all activities	0.1  0.1 0.1	Designated Staff (DS)  DS DS	

**Goal #2: Improve management of the risks of lead poisoning of exposed sub-populations**

Strategies B. Lead Program	Activities	Duration Due Date	Perf Measures	Resources (FTE's)	Lead Contact	Status
Overall Lead Program	Defined in strategies below	Ongoing	Number of lead-poisoned children (Target: 200,000 by 2006)  Number of homes with dust lead hazards (Target: TBD -Pending baseline data availability)		Simpson Mosby	Awaiting new data from CDC.
Strategy 1: Promote greater availability of lead risk identification and reduction, at lower cost	<p>Granted authorization for training &amp; certification programs</p> <p>Implemented Federal training and certification program</p> <p>Developed and distributed training courses</p> <p>Developed rule on training and certification for lead-based paint professionals</p> <p>Perform technical studies and product reviews to identify ways to assess and reduce lead risks at lower cost</p> <p>Provide appropriate free courses in high-risk "hot spots" and encourage attendance</p> <p>Evaluate children's blood lead levels in Indian country and develop programs through grants where appropriate</p>	<p>Complete/ongoing</p> <p>Complete/ongoing</p> <p>Complete/ongoing</p>	<p>Number of authorized States, Tribes, and territories (Target: on hold pending rule revisions &amp; additions)</p> <p>Number of people trained (Target: 5% growth per year)</p> <p>Average price of testing, risk assessment, abatement (Target: 2% reduction per year, adjusted for inflation)</p>	<p>\$90K</p> <p>\$1.2M</p>	<p>Simpson</p> <p>Simpson</p> <p>Simpson</p> <p>Simpson</p> <p>Mosby</p> <p>Simpson</p> <p>Mosby</p>	<p>Developing Rule Revisions</p> <p>FY03 1,193 and FY 02 1,707 people have been trained. Number of people certified: FY03 1,908 &amp; FY03 2,001</p> <p>FY03: 122 training providers with 556 disciplines/courses accredited.</p> <p>Completed</p> <p>Programmatic Funds Realignment resulted in withdrawal of activity</p> <p>Programmatic Funds Realignment resulted in withdrawal of activity</p> <p>Programmatic Funds Realignment resulted in withdrawal of activity</p>

Strategy 2: Empower parents and other caretakers to protect children directly	Developed pre-renovation information rule	Complete*	Level of understanding & personal protective action (Target TBD)	\$312.6K	Simpson	Completed
	Developed lead-based paint real estate disclosure rule	Complete*			Simpson	Completed
		Ongoing			Mosby	Activity Ongoing funds have been adjusted to \$408K
	Manage bilingual National Lead Information Center including hotline and clearinghouse	Ongoing			Watford	Collaborative outreach effort with Head Start programs. Ongoing
	Developed and distributed educational materials and national lead awareness campaigns				Mosby	Collaborative outreach effort with Head Start programs. Development of Family Assistance liaison to develop lead based paint screening process for homes.
	Initiated partnerships to conduct lead awareness activities targeted to at-risk populations					

Strategies B. Lead Program	Activities	Duration Due Date	Perf Measures	Resources (FTE's)	Lead Contact	Status
Strategy 3: Encourage improved maintenance of low-income dwellings	Develop positive/ negative incentive program for low-income landlords	Ongoing	Number of lead-poisoned children (Target: 200,000 by 2006)	TBD	Simpson	Programmatic Funds Realignment resulted in withdrawal of activity.
	Establish appropriate recognition for private sector "volunteers"			\$50K	Simpson	Programmatic Funds Realignment resulted in withdrawal of activity.
	Assemble group with emphasis on commitment to 1015 implementation & follow-through			\$10K	Simpson	Programmatic Funds Realignment resulted in withdrawal of activity.

## Risk Identification and Reduction/Prevention Component

**Goal # 1:** Provide EJ Communities with the ability to evaluate, prioritize and identify options to reduce risks to health and the environment

Strategies	Activities	Duration Due Date	Perf Measures	Resources (FTE/\$)	Lead Contact	Status
1. Develop tools to help communities understand and improve their environments	Complete and disseminate How-to-Manual for prioritizing and identifying options to reduce risk	FY '03	How-to Manual is published	0.2 FTE \$39K	Hank Topper	How To Manual is now completed and in product review; Manual will be published as soon as review is completed. Technical staff work on PFOA delayed publication of Manual.
2. Provide tools and training to communities	Develop materials and provide training to Regions and States using the How-to Manual for EJ communities	FY '03	Materials are developed 2 workshops held	0.5 FTE \$75K (funding has not yet been allocated)	Hank Topper, EETD/RAD	Work on training materials was delayed until Manual was completed. Training materials will use the product of High School Education product, the NEJAC Cumulative Risk report, and the Community Air Screening How To Manual as the basis for the development of training materials. Training materials will be completed and training provided in FY05.

**Goal #2:** Fill hazard data gaps on high production chemicals and chemicals of concern to children by collecting and disseminating information for use by the public

Strategies	Activities	Duration Due Date	Perf Measures	Resources (FTE/\$)	Lead Contact	Status
A. Hazard/Risk identification of exposed population to HPV chemicals, including relevant subpopulations	1. HPV Volunteer Initiative Commitment from Industry on Volunteer Initiative	12/01/99	a. (number of chemicals)	part of larger program addressing all affected parties	CCD W. Penberthy	Completed
	2. HPV Test Rule Issuance of Test Rule	12/26/00	b. (number of chemicals) c. Publication of Q & A			Completed
B. Hazard/Risk identification of exposed population to VCCEP chemicals, including relevant subpopulations	3. Collection of data		1. (Number of Chemicals)	Part of larger program addressing all affected parties	CCD W. Penberthy	Scheduled to be completed by December 2005
	1. VCCEP Volunteer Initiative		2. Publication of Q&A			Tier I assessments received for 6 chemicals;  Vinylidene Chloride, Deca-, Octa-, and Penta-brominated diphenylethers, Acetone, and Methyl Ethyl Ketone (MEK) (2002-2003)  Public Peer Consultation meetings held (2003-2004)  Reports on the first 5 Peer Consultation meetings submitted to EPA (report for MEK meeting is in preparation). (2003-2004)  The 6 Tier 1 chemical assessments and the 5 Peer Consultation meeting reports have been made available to the public on the VCCEP website, <a href="http://www.epa.gov/chemrtk/vccep/">www.epa.gov/chemrtk/vccep/</a> (2002-2004)

**Goal#3:** Address targeted areas of concern through support for the NEJAC Health & Research and P2 Subcommittees

Strategies	Activities	Duration Due Date	Perf Measures	Resources (FTE/\$)	Lead Contact	Status
1. Identify ways to use cumulative risk assessment to address environmental health disparities in EJ communities	<p>a. Work with the NEJAC subcommittee to identify assessment tools</p> <p>b. Work with subcommittee and agency experts to find ways to apply tools to EJ communities health concerns</p>	Mid-to Late-2003		0.1 FTE	Cary Carroll	April 2004, the Health and Research Subcommittee provided to the NEJAC Executive Council a report describing key indicators to consider when conducting a cumulative risk assessment.
2. Coordinate production of NEJAC report with workgroup co-chairs, contractor, and topic groups	<p>a. Produce report by Fall of 2002</p> <p>b. Brief OPPT management, OEJ, and NEJAC of report results</p>	Fall, 2002	Produce Report	0.1 FTE	Sharon Austin	Completed. The report, "Advancing Environmental Justice Through Pollution Prevention" was completed in June 2003.
3. Coordinate presentation of report at NEJAC public comment meeting in December 2002 meeting	<p>a. Coordinate report out at National Meeting</p> <p>b. Compile results from NEJAC meeting report out for possible OPPT implementation</p>	December 2002	Report issued	0.1 FTE	Sharon Austin	Completed. The NEJAC Executive Council meeting was held on December 9, 2003, in Baltimore, Maryland

## Actions for Tribal Communities Component

**GOAL #1:** Strengthen toxic and pollution prevention program development, support, and implementation in Indian country

Strategies	Activities	Duration Due Date	Perf Measures	Resources (FTE/\$)	Lead Contact	Status
<p><b>1.</b> Improve the ability of tribes to define, design, implement and sustain well-rounded pollution prevention programs and activities that meet the future needs in Indian County.</p>	<p><b>1.</b> OPPT is preparing a comprehensive Tribal guidance document to assist Tribes to implement pollution prevention program and activities. This document will contain tribal relevant materials through the assistance and compilation of research from the Oglala Lakota Tribal College who will be working with Partnership for Environmental Technology Education Organization on this guidance document. This guidance will be mailed to out to all federally recognized Tribes.</p>	<p><b>1.</b> FY 2003-2004</p>	<p><b>1a.</b> Document Completion</p>	<p><b>1a.</b> 24K/ 0.1 FTE</p>	<p>Mary Lauterbach</p>	<p>Under a general heading of "Greening Indian Country," this program sought to enhance the awareness and use of pollution prevention and more environmentally friendly approaches in Indian Country. Specific elements included:</p> <ul style="list-style-type: none"> <li>- Developed a 4-page brochure to describe the Mohegan Sun as a Pollution Prevention success story.</li> <li>- Design for a Tribal Portal into the P2RX Information Network</li> <li>- Initiated a Strategy with the national PETE</li> <li>- PPD established a two-year effort to expand Tribal involvement in the Roundtable.</li> <li>- Continued work on Tribal participation in the Hospitals for a Healthy Environment and related programs. Continued to build on Region 5 and Region 9 work on reducing mercury at Tribal (Indian Health Service) health clinics.</li> </ul>

Strategies	Activities	Duration Due Date	Perf Measures	Resources (FTE/\$)	Lead Contact	Status
<p><b>2.</b> Improve the ability of EPA and Tribes to identify the extent of lead exposure in Indian County.</p> <p><b>3.</b> Improve ability of Tribes to conduct contaminant exposure and risk assessments related to a subsistence way of life</p>	<p><b>2.</b> To continue funding in FY 03, for the tribal set-aside grant program to implement blood-lead screening and lead awareness in Indian Country.</p>	<p><b>2a.</b> FY 2003</p>	<p><b>2a.</b> How many Indian children have been tested for lead poisoning/ how many outreach programs</p>	<p><b>2a.</b> \$1.2 mil./ 0.5 FTE</p>	<p>Darlene Watford</p>	<p>Full information not yet available. 21 grants issued in FY03 to Indian Tribes</p>
	<p><b>3a.</b> To convene a technical meeting of Tribal scientists, elders, environmental directors, and tribal risk assessors to identify the tools necessary for tribes to conduct these assessments. The National Tribal Environmental Council and Alaska Native Science Commission are assisting in this effort.</p>	<p><b>3a.</b> FY 2003</p>	<p><b>3a.</b> The identification of a set of tools through a written report on findings</p>	<p><b>3a.</b> \$75K/ 0.8 FTE</p>	<p>Phil Robinson</p>	<p>Completed: Meeting was held on April 13-15, 2003.</p>
	<p><b>3b.</b> OPPT shall have implemented next phases of the OPPTS Tribal Subsistence Project that addresses aspects of Tribal Subsistence Risk Concerns</p>	<p><b>3b.</b> FY 2003</p>	<p><b>3b.</b> Comp. next phase</p>	<p><b>3b.</b></p>	<p>Phil Robinson / Darlene Harrod</p>	<p>OPPT continued through the balance of FY03 to consult with Tribal representatives and Tribal organizations to identify the next phase of this program. A consensus had not been reached by September 30, 2003.</p>

Strategies	Activities	Duration Due Date	Perf Measures	Resources (FTE/\$)	Lead Contact	Status
4. To build Tribal capacity to assess environmental threats from toxic chemicals and pesticides, including persistent, bioaccumulative toxics (PBTs) and radio nuclides, in foods and other materials important to Tribal cultures.	4a. Provide competed tribal grants for targeted, PBT "field projects" such as doxin, pcbs, and other priority PBT protection.	4a. 2-year program starting in Summer 2003.	4a. Award grants and follow up on success rates	4a. \$ 50K of FY 2002 money awarded in Summer of 2003	Paul Mathaii	A grant to reduce dioxin emissions from open burning on tribal lands has been issued.
	4b. Tribes will field test the tools and guidelines that will enable them to better understand and manage the contaminant exposure pathways and the resulting risks from the unique usages and circumstances associated with their culture, religion, and traditional ways of life.	4b. Ongoing through FY 03-04	4b. Number of Tribes testing tools	4b. 0.08 FTE	Phil Robinson/ Darlene Harrod	This program was incorporated into the OPPTS Tribal Subsistence Project noted above. No field tests have been completed to date.
	5. Work closely with tribes to identify national toxic and pollution prevention issues that are of significant concern to tribal populations.	5a. Continue to work in close partnership with Tribal Affairs Project members of FOSTTA to clearly identify industrial chemical related concerns of Indian country.	5a. Ongoing	5a. Three national meetings/year- Monthly conference calls	5a. \$90K .5 FTE	Mary Lauterbach
	5b. Ensure that appropriate EPA decision makers are aware of Indian country's toxic and p2 related concerns, and take those concerns into consideration when making regulatory decisions.	5b. Ongoing	5b. Regularly scheduled in-house information sharing meetings at all levels.	5b. 0.1 FTE/		This is an ongoing activity. Examples include a) specific Tribal concerns regarding the applicability of OPPT's lead program to Indian Country and b) the review and sign-off of OPPTS Tribal strategy which includes concerns raised by Tribes on toxics and P2 programs through a series of focus group meetings with Tribal representatives.
6. Ensure that tribes are appropriately brought into stakeholder discussions of such issues, and that tribal concerns are considered during OPPT's decision making processes.	6a. Disseminate information on EPA projects, programs, emerging issues and grant opportunities that may affect and/or be of interest to pesticide program managers in Indian country.	6a. Ongoing	6a. OPPTS Tribal Newsletter.	6a. \$68K 0.8 FTE	Mary Lauterbach	OPPT has prepared four editions of the <i>OPPTS Tribal News</i> which contain such information and has distributed them to all federally recognized Tribes and all Tribal environmental organizations.

Strategies	Activities	Duration Due Date	Perf Measures	Resources (FTE/\$)	Lead Contact	Status
7. Tribal EJ Program Evaluation	Prepare an annual OPPT Tribal EJ progress report on these activities	End of Calendar Year December 31st	Completion of the report	0.1 FTE	Mary Lauterbach	This activity has been incorporated into the OPPTS Tribal Strategy which will be completed in FY04. The program evaluation component will be initiated upon completion of the first Tribal program implementation plan for FY05.

**4. General Component**

**Goal #1:** To increase understanding and awareness of Environmental Justice by EPA staff.

Strategies	Activities	Duration Due Date	Perf Measures	Resources (FTE/\$)	Lead Contact	Status
1. Provide EJ training to OPPT	As resources become available, develop materials for workshop  Hold EJ workshop in OPPT	FY2003  FY2003, 2004	  Workshop held	TBD	Gary Carroll	OPPTS, with the assistance from a graduate intern, developed an EJ training needs assessment.
2. Provide traditional science training to technical staff	As resources become available, work with triblentivity (eg NTEC) to develop training on traditional science.  Hold training	FY2003  FY2003, 2004	Training provided to OPPT technical staff	TBD	Gary Carroll	OPPTS, with the assistance from a graduate intern, developed an EJ training needs assessment. Programmatic specific training is scheduled to take place in 2004.